

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

Case No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.* (Jointly Administered)

Debtors.¹

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**INFORMATIVE MOTION OF COUNSEL FOR PREPA
FOR APPEARANCE AT NOVEMBER 7-8, 2018 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Electric Power Authority (“PREPA”), through undersigned counsel, respectfully submits this Informative Motion in response to the Court’s order entered on October 26, 2018 [Case No. 17-BK-3283, ECF No. 4103] regarding attendance and participation at the November 7-8, 2018 omnibus hearing (the “Omnibus Hearing”).

1. Kevin D. Finger, Nathan A. Haynes, and Ryan A. Wagner of Greenberg Traurig intend to appear in person at the Omnibus Hearing in the San Juan courtroom in connection with (i) the *Motion for Relief from Stay to Execute Set-Off*, filed by Pan American Grain Co., Inc. [Case

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

No. 17-BK-3283, ECF No. 4004] (the “Lift Stay Motion”) and (ii) Greenberg Traurig’s third interim fee application as counsel for PREPA and as counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), as fiscal agent for PREPA [Case No. 17-BK-3283, ECF No. 3556].

2. Mr. Finger will address PREPA’s objection to the Lift Stay Motion and Mr. Haynes or Mr. Wagner will address any questions the Court may have with respect to Greenberg Traurig’s fee application.

3. Katuska Bolaños-Lugo of Cancio, Nadal, Rivera & Diaz, PSC will appear in person in the San Juan Courtroom but does not seek to be heard.

WHEREFORE, counsel respectfully requests that the Court take notice of the above.

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Dated: November 1, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/ Nathan A. Haynes

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Nathan A. Haynes
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